STATEMENT OF BASIS (AI No. 17216)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0104906 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Florida Gas Transmission Company
Compressor Station No. 9
18169 Lee Road
Franklinton, Louisiana 70438

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Melanie Connor

DATE PREPARED: August 7, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: Not applicable
NPDES permit expiration date: Not applicable
EPA has not retained enforcement authority.

C. LWDPS permit - (WP 3344) LWDPS permit effective date: July 14, 1992
LWDPS permit expiration date: July 13, 1997

D. Date Application Received: July 6, 1999 with additional information received via letters on March 24, 2000, June 12, 2000, and May 22, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - natural gas compressor station

This existing facility compresses natural gas as part of the Florida Gas Transmission Company system which moves natural gas from the production fields in the west to the market in the east. The facility discharges of treated engine jacket water, engine room floor drain wastewater, cooling tower blowdown, washrack wastewater, and stormwater that collects in the lube oil storage tank containment; and stormwater from the rest of the facility. Washrack wastewaters consist of washwater from various parts and equipment. With regard to cooling tower blowdown, since evaporation typically occurs more rapidly than needed for blowdown, discharge of cooling tower blowdown is extremely intermittent and has not occurred within the last several years. If it were to be discharged, the volume of cooling tower blowdown is estimated to be approximately 150 GPD. Sanitary wastewater is discharged to an on-site septic system with underground field lines.

B. FEE RATE
1. Fee Rating Facility Type: Minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 4922

C. LOCATION - 6 miles south of Sheridan off Lee Road in Section 14 of Township 3 South, Range 11 East, Washington Parish (Latitude 30°47'01", Longitude 90°04'00")

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: The intermittent discharge of overflow from the retention pond receiving stormwater drainage from the engine rooms, stormwater from approximately the central third of the western half of the facility, blowdown from the water regenerator, and previously monitored effluent from Internal Outfall 101

Treatment: Settling

Location: At the point of discharge from the retention pond prior to mixing with other waters (Latitude 30°47'04", Longitude 90°03'43")

Flow: Intermittent

Discharge Route: Bogue Chitto River via local drainage to Thigpen Creek, thence to Mill Creek

Outfall 101 (Internal)

Discharge Type: The intermittent discharge of engine jacket water, main engine room floor drain wastewater, Phase III engine room floor drain wastewater, cooling tower blowdown, washrack wastewater, and stormwater that collects in the lube oil storage tank containment

Treatment: Oil/water separator and filtration

Location: At the point of discharge from the oil/water separator and filtration system prior to entering the retention pond (Latitude 30°47'02", Longitude 90°03'42")

Flow: 6,000 GPD (max)

Discharge Route: Bogue Chitto River via local drainage to Thigpen Creek, thence to Mill Creek

4. RECEIVING WATERS

STREAM - Bogue Chitto River via local drainage to Thigpen Creek, thence to Mill Creek

BASIN AND SUBSEGMENT - Pearl River Basin, Subsegment 090506

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. outstanding natural resource waters

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

LDEQ records were reviewed for the period from January 2000 through present. No records of enforcement actions were found.

B. DMR Review/Excursions

Based on a review of DMR data for the period from January 2000 through present, the facility has had the following excursions:

Date	Parameter	Outfall	Reported Value	Permit Limits
06/00	COD	001	127 mg/L (max)	125 mg/L (max)
08/00	COD	001	141 mg/L (max)	125 mg/L (max)
01/00	TOC	101	152 mg/L (max)	50 mg/L (max)
01/00	COD	101	510 mg/L (max)	125 mg/L (max)
03/00	COD	101	300 mg/L (max)	125 mg/L (max)
03/00	TOC	101	84.9 mg/L (max)	50 mg/L (max)
03/00	TSS	101	64 mg/L (max)	45 mg/L (max)
06/00	COD	101	168 mg/L (max)	125 mg/L (max)
08/00	COD	101	905 mg/L (max)	125 mg/L (max)
08/00	TOC	101	244 mg/L (max)	50 mg/L (max)
11/00	TOC	101	817 mg/L (max)	50 mg/L (max)
11/00	COD	101	2580 mg/L (max)	125 mg/L (max)
10/01	COD	101	133 mg/L (max)	125 mg/L (max)
07/02	COD	101	170 mg/L (max)	125 mg/L (max)
07/02	TOC	101	262 mg/L (max)	50 mg/L (max)
11/02	COD	101	941 mg/L (max)	125 mg/L (max)
03/03	COD	101	155 mg/L (max)	125 mg/L (max)
09/03	COD	101	129 mg/L (max)	125 mg/L (max)
02/04	COD	101	809 mg/l (max)	125 mg/l (max)

02/04	TOC	101	245 mg/l (max)	50 mg/l (max)
03/04	COD	101	266 mg/L(max)	125 mg/l (max)
03/04	COD	101	81.2 mg/l (max)	50 mg/l (max)
03/04	pH	101	4.5 s.u. (min)	6.0 s.u (min)
04/04	COD	101	278 mg/l (max)	125 mg/l (max)
04/04	TOC	101	84.9 mg/l (max)	50 mg/l (max)
05/04	COD	101	249 mg/l (max)	125 mg/l (max)
05/04	TOC	101	73 mg/l (max)	50 mg/l (max)
07/04	TOC	101	136 mg/l (max)	125 mg/l (max)
01/05	COD	101	352 mg/l (max)	125 mg/l (max)
01/05	TOC	101	101 mg/l (max)	50 mg/l (max)

7. CHANGES FROM EXISTING PERMIT

The following changes have been made from the 1992 LWDPS permit:

A. For Outfall 001, blowdown from the water regenerator is added as a wastewater.

B. Biomonitoring requirements are deleted, since the volume of cooling tower blowdown is so small.

C. A Stormwater Pollution Prevention Plan (SWP3) requirement is added to the draft permit, in accordance with current DEQ stormwater policy.

D. For Outfall 001, monitoring for COD, Temperature, Toxicity, visible sheen and dissolved oxygen have been removed based upon current office practices.

E. For Outfall 101, monitoring for TOC, Oil & Grease, Total Residual Chlorine, TSS, Visible Sheen and pH have been removed from the permit in accordance with current office practices.

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 090506 of the Pearl River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Gulf Sturgeon, which are listed as threatened and an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Gulf Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The

more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

A public notice shall be published in a local newspaper of general circulation and in the Office of Environmental Services Public Notice Mailing List.

Rationale for Florida Gas Transmission Company

1. **Outfall 001**: the intermittent discharge of overflow from the retention pond receiving stormwater drainage from the engine rooms, stormwater from approximately the central third of the western half of the facility, blowdown from the water regenerator, and previously monitored effluent from Internal Outfall 101

Pollutant	Limitation Mo. Avg:Daily Max (mg/l)	Reference
Flow (MGD)	Report:Report	LAC 33:IX.2707.I.1.b
Oil & Grease	---:15	BPJ; *, **, LDEQ Stormwater Guidance
TOC	---:50	BPJ; *, **, LDEQ Stormwater Guidance
pH	6 su - 9 su	BPJ; *, **, LDEQ Stormwater Guidance

* Existing permits for similar outfalls
** General Rationale for Natural Gas Processing Plants and Compressor Stations (revised 1/7/04)

BPJ Best Professional Judgement
su Standard Units

Treatment: Settling

Monitoring Frequency: Flow, TOC, oil and grease, and pH are monitored once per quarter.

Limits Justification: Flow reporting is consistent with LAC 33:IX.2707.I.1.b. TOC, oil and grease, and pH limitations are BPJ based on the 1996 state permit, existing permits for similar outfalls, General Rationale for Natural Gas Processing Plants and Compressor Stations (revised 1/7/04), and LDEQ Stormwater Guidance. [letter dated June 17, 1987, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)].

2. Outfall 101: The intermittent discharge of engine jacket water, main engine room floor drain wastewater, Phase III engine room floor drain wastewater, cooling tower blowdown, washrack wastewater, and stormwater that collects in the lube oil storage tank containment

Pollutant	Limitation Mo. Avg:Daily Max (mg/l)	Reference
Flow	Report:0.006 MGD	LAC 33:IX.2707.I.1.b; BPJ
COD	---:125 mg/L	BPJ; *; **, Previous permit

* Existing permits for similar outfalls
** General Rationale for Natural Gas Processing Plants and Compressor Stations
BPJ Best Professional Judgement
su Standard Units

Treatment: Oil/water separator and filtration

Monitoring Frequency: All parameters shall be monitored 1/month.

Limits Justification: Flow reporting is consistent with LAC 33:IX.2707.I.1.b and the limit for COD is established in accordance with the previous permit.

3. TMDL Waterbody (Subsegment No. 090506, Pearl River Basin)

Subsegment 090506, is listed on LDEQ's Final 2004 303(d) List as impaired for pathogen indicators. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Pearl River Basin, those suspected causes for impairment which are not directly attributed to this facility have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. The Florida Gas Transmission Company/Compressor Station No. 9 does not discharge sanitary wastewater to the waters of the state. The facility has a septic system with underground field lines. Therefore, the potential for the discharge of pathogen indicators from the compressor station is unlikely.

4. Stormwater Pollution Prevention Plan (SWP3) Requirement

A SWP3 is included in the permit since there is a potential for stormwater contamination from processes including loading, unloading, equipment and area washdown, and materials storage.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of stormwater pollution and ensure the implementation of practices to prevent and reduce pollutants in stormwater discharges associated with industrial activity at the facility (see Part II, Paragraph L of the Draft Permit).